

Exhibit B

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS

A Federal Court authorized this notice. This is not a solicitation from a lawyer.

- A class has been certified in a lawsuit concerning whether Agentra, LLC (either directly or via a third party acting on its behalf) made or sent unlawful telemarketing phone calls or text messages. Agentra denies that it violated any law and asserts certain defenses. The Court has not yet determined who is right. Rather, you are receiving this notice because your rights may be impacted by the pending litigation.

- On September 14, 2020 the Court certified two Classes defined as follows:

Text Class: All persons in the United States who, from January 15, 2015 through [the date notice is sent to the Class] received one or more text messages on their cellular telephone, via Agentra's CRM system, for the same purpose as the text messages at issue were sent to Plaintiff, and for whom Agentra has no record of prior express consent.

Agent Class: All persons in the United States who, from January 15, 2015 through [the date notice is sent to the Class], Health Care Enrollment Center or Life and Health Insurance Services (or any of their sub-dealers, vendors, lead generators, or agents) called, on the person's cellular telephone, for the purpose of promoting Agentra's insurance products or that could have resulted in the purchase of an Agentra insurance product, using the same equipment as was used to call Plaintiff, for whom Defendant claims prior express written consent was obtained in the same manner as Defendant claims prior express written consent was obtained to call Plaintiff, or for whom Defendant has no record of prior express written consent.

- **Please read this notice carefully.** Your legal rights are affected whether you act, or don't act.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
EXCLUDE YOURSELF	You will receive no benefits from any judgment in favor of the Class, but you will retain any rights you currently have to sue the Defendant separately about the claims in this case.
DO NOTHING	You get a share of any judgment in favor of the Class and any other benefits awarded to the Class but give up your right to sue the Defendant separately about the claims in this case.

These rights and options – **and the deadlines to exercise them** – are explained in this Notice.

BASIC INFORMATION

1. Why was this Notice issued?

A federal court authorized this notice because you have a right to know about this class action lawsuit and about all of your options before the case is adjudicated on the merits. This Notice explains the lawsuit and your legal rights.

Judge Starr of the U.S. District Court for the Northern District of Texas is overseeing this case (the “Lawsuit”). The Lawsuit is known as *Abboud v. Agentra, LLC*, Case No. 3:19-cv-00120-X. Monica Abboud, the individual who sued, is called the Plaintiff/Class Representative. The Defendant is Agentra, LLC.

2. What is a Class Action?

In a class action, one or more named plaintiffs called Class Representatives (in this case, Monica Abboud) sues on behalf of a group or a “class” of people who have similar claims. In a class action, the court resolves the issues for all Class Members, except for those who exclude themselves from the Class.

3. What is this Lawsuit about?

This lawsuit alleges that Agentra unlawfully sent text messages and made telemarketing telephone calls to cellphones in violation of the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.* (“TCPA”). Agentra denies that it violated any law and maintains that it has several defenses. If the Class Representative prevails in showing that Agentra violated the TCPA, the TCPA provides for statutory damages in the amount of \$500 per violation, which may be trebled to \$1,500 if willfulness is determined by the judge or jury.

The Court has not determined who is right at this time. Such matters will be adjudicated through ongoing litigation of the Lawsuit.

WHO’S INCLUDED IN THE LAWSUIT?

4. How do I know if I am in the Class?

The Court in this case certified two classes, defined as follows:

Text Class: All persons in the United States who, from January 15, 2015 through [the date notice is sent to the Class], received one or more text messages on their cellular telephone, via Agentra’s CRM system, for the same purpose as the text messages at issue were sent to Plaintiff, and for whom Agentra has no record of prior express consent.

Agent Class: All persons in the United States who, from January 15, 2015 through [the date notice is sent to the Class], Health Care Enrollment Center or Life and Health Insurance Services (or any of their sub-dealers, vendors, lead generators, or agents) called, on the person’s cellular telephone, for the purpose of promoting Agentra’s insurance products or that could have resulted in the purchase of an Agentra insurance product, using

the same equipment as was used to call Plaintiff, for whom Defendant claims prior express written consent was obtained in the same manner as Defendant claims prior express written consent was obtained to call Plaintiff, or for whom Defendant has no record of prior express written consent.

HOW TO GET BENEFITS

5. How do I get any benefits awarded to the Class?

If you are a Class Member, you need not do anything to receive any benefits that may be awarded to the Class.

REMAINING IN THE LAWSUIT

6. What am I giving up if I stay in the Lawsuit?

If you stay in the Class you will give up your right to sue Agentra separately for the claims being adjudicated in this litigation. Unless you exclude yourself (*see* Questions 10 & 11), you are part of the lawsuit, regardless of whether you take any further action.

If you have any questions you can talk to Class Counsel listed in Question 8 for free or you can, of course, talk to your own lawyer if you have questions about what this means.

7. What happens if I do nothing at all?

If you do nothing at this time, you stay in the lawsuit and are able to participate in any judgment awarded to the Class. Unless you exclude yourself, you won't be able to start a separate lawsuit for these same claims against the Defendant.

THE LAWYERS REPRESENTING YOU

8. Do I have a lawyer in the case?

The Court has appointed the attorneys of Woodrow & Peluso, LLC, to be the attorneys representing the Class. They are called "Class Counsel." You will not be charged by these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense. You may also enter an appearance though an attorney if you so desire.

9. How will the lawyers be paid?

Class Counsel may seek, and the Court may award, an amount of reasonable attorney's fees to be paid from or in addition to any judgment awarded to the Class.

EXCLUDING YOURSELF FROM THE LAWSUIT

10. How do I get out of the Lawsuit?

To exclude yourself from the Lawsuit, you must send a letter (or request for exclusion) by mail stating that you want to be excluded from *Abboud v. Agentra, LLC*. Your letter or request for exclusion must also include your name, your address, and your signature. You must mail your exclusion request so that it is postmarked no later than **xx, 2021** to:

Abboud v. Agentra, LLC

Case No. 3:19-cv-00120

[Address Line 1]

[Address Line 2]

[TOLL FREE NUMBER]

The Court will exclude from the Class any Class Member who timely requests exclusion from the Class.

11. If I don't exclude myself, can I sue the Defendant for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Agentra for the claims being adjudicated by this lawsuit.

12. If I exclude myself, can I get anything from this Lawsuit?

No. If you exclude yourself, you will not be able to receive benefits from any judgment or settlement (in the event one is reached in the Lawsuit).

13. Do I have to come to any hearings?

No. Class Counsel will answer any questions the Court may have and will call any necessary witnesses. But you are welcome to come to any Court hearings at your own expense. You may also pay another lawyer to attend, but it's not required.

GETTING MORE INFORMATION

14. Where do I get more information?

This Notice summarizes the Lawsuit. You request further information by writing the Class Administrator at **P.O. Box 0000, City, ST 00000** or by visiting **www.[website].com**. You can call the Class Administrator at **1-800-000-0000** or Class Counsel at **1-720-213-0676**, if you have any questions. Before doing so, however, please read this full Notice carefully.